

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
DIVISION

NICK LEE d/b/a THOMAS AND SONS
JEWELRY, INC.,

Plaintiffs,

VS.

ADT SECURITY SERVICES, INC. and
UNDERWRITERS LABORATORIES, INC.,

Defendants.

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Civil Action No. H-02-4947

FILED
2004 OCT 22 PM 4:38
U.S. COURTS
SOUTHERN DISTRICT
OF TEXAS

**PLAINTIFF, THOMAS AND SONS JEWELRY, INC.'S
REQUESTED VOIR DIRE QUESTIONS FOR COURT**

Plaintiff, Nick Lee d/b/a Thomas and Sons Jewelry, Inc.,, submits its attached list of proposed voir dire questions, as follows:

1. Do any of you on the panel know any of the attorneys or parties in this case?
2. How many of you are familiar with ADT and the products and services that they provide?
3. Does anyone here currently have an alarm system provided by ADT?
4. ADT is a part of Tyco International Incorporated. Does anyone here own stock in Tyco International?
5. Has anyone here ever been burglarized while they had an alarm system? If so,
 - a. Were you called by the security system to notify you that a break in was taking place?
 - b. What, if anything, was taken?
 - c. What was the name of the alarm company that you had?

6. Is there anyone here who either personally or has a close family member who is employed by ADT? If so, in what capacity is that person employed?
7. Is there anyone here who either individually or has a close family member who has provided sub-contract work for ADT? If so, what was the nature of the relationship?
8. For those of you who have alarm systems monitored by ADT, would you feel comfortable in sitting as a juror in this case?
9. Is there anyone here who either individually or has a close family member who has been employed in the Jewelry store industry? If so, what is or was the nature of that employment?
10. Is there anyone here who has been involved in a business dispute? If so, what were the circumstances of the dispute and how was it resolved?
11. Is there anyone here who has had any legal training of any sort? If so, what is the nature of the legal training that you have had?
12. Is there anyone here who has been involved either individually or who has a close family member who has been involved in the adjusting of claims? If so, who is the person that was or is involved in adjusting claims and exactly in what type of capacity are they or were they employed?